

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Rodney David Oliver, Pro Se Defendant

Case No. 1:24-cv-07509 (DLC)

Dear Honorable Judge Denise L. Cote,

- Filing of a new, related copyright infringement action

I have filed a new against a third party for copyright infringement. This relates to a composition that I solely own and a master sound recording that I co-own with Ms. Necole Key. That action is based on unauthorized use of Everlasting Bass in the work Like That by Future distributed by Wilbum Holdings Co, Epic and others

I respectfully request that the Court consider consolidating this matter with a newly filed, related case involving copyright infringement of the same composition and master sound recording at issue here. The new case, which I filed pro se, involves a third party's unauthorized use of the composition I solely own and a master recording I co-own with Ms. Necole Key. Given the factual overlap, legal issues concerning ownership and infringement, and to promote judicial efficiency and avoid conflicting outcomes, I believe consolidation is appropriate under Rule 42(a) of the Federal

Rules of Civil Procedure.

Thank you for your time and continued oversight of these proceedings.

Respectfully submitted,

/s/ Rodney David Oliver

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Certificate of Service

I hereby certify that on May 1, 2025, I served a true and correct copy of the foregoing letter on all counsel of record via email and/or the Court's electronic filing system.

Respectfully submitted,

/s/ Rodney David Oliver

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